April Barker

From: April Barker

Sent: Thursday, October 7, 2021 9:19 AM

To: Walker, Leita

Cc: George Burnett; Kevin Vick; Jeffrey Payne; Jean-Paul Jassy; Parsons, Emmy; Kelley,

Matthew E.; Michael Griesbach

Subject: Re: Colborn -- Letter responding to Motion for Sanctions

Leita,

I cannot respond to your entire correspondence immediatly, but suffice it to say that I disagree with virtually all of it, including the way you characterized our conversation on September 16.

However, to clarify as an initial matter, your discovery requests were only validly served on us by mail, because we had not consented to service by email (as you acknowledged in your recent message).

Therefore, three days are added to the response period under Federal Rule of Civil Procedure 6. Accordingly, the responses are timely.

EXHIBIT

April

From: Walker, Leita < WalkerL@ballardspahr.com>

Sent: Thursday, October 7, 2021 8:31 AM **To:** April Barker <abarker@sbe-law.com>

Cc: George Burnett <GB@lcojlaw.com>; Kevin Vick <kvick@jassyvick.com>; Jeffrey Payne <jpayne@jassyvick.com>; Jean-

Paul Jassy <jpjassy@jassyvick.com>; Parsons, Emmy <parsonse@ballardspahr.com>; Kelley, Matthew E.

<KelleyM@ballardspahr.com>; Michael Griesbach <attymgriesbach@gmail.com>

Subject: Colborn -- Letter responding to Motion for Sanctions

April, please see attached correspondence.

Sincerely,

Leita Walker

Ballard Spahr

2000 IDS Center, 80 South 8th Street Minneapolis, MN 55402-2119 612.371.6222 DIRECT 612.371.3207 FAX

walkerl@ballardspahr.com

www.ballardspahr.com

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April Barker

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Sent: Thursday, October 7, 2021 9:31 AM

To: April Barker

Cc: George Burnett; Kevin Vick; Jeffrey Payne; Jean-Paul Jassy; Parsons, Emmy; Kelley,

Matthew E.; Michael Griesbach

Subject: RE: Colborn -- Letter responding to Motion for Sanctions

April, thanks for your email. Please let me know when you can respond substantively to the letter and whether you will withdraw the motion for sanctions.

Leita

From: April Barker <abarker@sbe-law.com> Sent: Thursday, October 7, 2021 9:19 AM

To: Walker, Leita (Minn) < WalkerL@ballardspahr.com>

Cc: George Burnett <GB@lcojlaw.com>; Kevin Vick <kvick@jassyvick.com>; Jeffrey Payne <jpayne@jassyvick.com>; Jean-

Paul Jassy <ipjassy@jassyvick.com>; Parsons, Emmy (DC) <parsonse@ballardspahr.com>; Kelley, Matthew E. (DC)

<KelleyM@ballardspahr.com>; Michael Griesbach <attymgriesbach@gmail.com>

Subject: Re: Colborn -- Letter responding to Motion for Sanctions

EXTERNAL

Leita,

I cannot respond to your entire correspondence immediatly, but suffice it to say that I disagree with virtually all of it, including the way you characterized our conversation on September 16.

However, to clarify as an initial matter, your discovery requests were only validly served on us by mail, because we had not consented to service by email (as you acknowledged in your recent message).

Therefore, three days are added to the response period under Federal Rule of Civil Procedure 6. Accordingly, the responses are timely.

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Sent: Thursday, October 7, 2021 8:31 AM **To:** April Barker abarker@sbe-law.com

Cc: George Burnett < GB@lcojlaw.com >; Kevin Vick < kvick@jassyvick.com >; Jeffrey Payne < jpayne@jassyvick.com >; Jean-

Paul Jassy < <u>ipjassy@jassyvick.com</u>>; Parsons, Emmy < <u>parsonse@ballardspahr.com</u>>; Kelley, Matthew E.

<KelleyM@ballardspahr.com>; Michael Griesbach <a tymgriesbach@gmail.com>

Subject: Colborn -- Letter responding to Motion for Sanctions

April, please see attached correspondence.

Sincerely,